

FILED

SEP 21 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTIONETTE STEVENSON,

Defendant.

No.

4:22-cr-00523 SEP

INFORMATION

The United States Attorney charges that:

COUNT ONE
(Wire Fraud: 18 U.S.C. § 1343)

A. Introduction

At all times material to this Information, unless otherwise specified below:

1. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law that was enacted in or around March 2020 to provide emergency financial assistance to the millions of Americans suffering the economic impact caused by the COVID-19 pandemic. In connection with the CARES Act, the President of the United States declared the pandemic to be a nationwide emergency pursuant to Sec. 501(b) of Stafford Act. Among other things, the CARES Act made "COVID-19 Emergency Solutions Grants" available to states for emergency rental arrears assistance. The MHDC administered and distributed COVID-19 Emergency Solutions Grants for the State of Missouri under the Missouri Emergency Rental Arrears Program ("ERAP"). ERAP provided financial support for landlords and renters who were struggling due to the COVID-19 emergency in the State of Missouri. The program reimbursed eligible landlords for past due

rent payments caused by the COVID-19 pandemic. To receive ERAP assistance, landlords had to complete and submit applications to the MHDC in collaboration with their tenant. If approved, the MHDC provided eligible landlords with up to six months of rental arrears.

2. To obtain rental assistance under ERAP, a qualifying landlord was required to submit an electronic application to the MHDC. For ERAP applications, a landlord had to submit contact information for the landlord and the tenant, including a copy of the landlord's W-9 and a copy of the tenant's photo identification. Under the program, the landlord was also required to submit a copy of the lease agreement along with the landlord's banking information. In exchange for the MHDC's rental assistance under the program, landlords were also required to agree not to evict the tenant for a certain amount of time. To complete an application for rental assistance under ERAP, landlords were also required to certify that their statements to the MHDC were true and correct to the best of their knowledge.

3. Defendant **ANTIONETTE STEVENSON** resided in St. Louis, Missouri, within the Eastern District of Missouri.

B. The Scheme to Defraud

4. Beginning by at least on or about July 1, 2020, and continuing through at least on or about July 26, 2021, in the Eastern District of Missouri, and elsewhere, the defendant, **ANTIONETTE STEVENSON**, with the intent to defraud, devised and intended to devise a scheme and artifice to defraud the MHDC and to obtain money and property from the MHDC by means of material false and fraudulent pretenses, representations, and promises, as described further herein.

5. It was part of the scheme and artifice to defraud that, between on or about March 24, 2021, until at least on or about April 28, 2021, Defendant submitted a total of 9 fraudulent ERAP applications for rental assistance to the MHDC.

6. It was further part of the scheme and artifice to defraud that, for each of the fraudulent applications that Defendant submitted to the MHDC, Defendant falsely listed the landlord as her ex-boyfriend (S.M.), who was incarcerated at the time of the fraudulent applications.

7. It was further part of the scheme and artifice to defraud that Defendant submitted fraudulent lease agreements to the MHDC in support of each of the fraudulent applications for rental assistance that she submitted to the MHDC. In each of the fraudulent lease agreements, Defendant falsely listed her ex-boyfriend (S.M.) as the landlord. But, in truth and fact, and as Defendant well knew, S.M. never served as the landlord for any of the tenants listed in the fraudulent lease agreements.

8. It was further part of the scheme and artifice to defraud that, for each of the 9 fraudulent ERAP applications for rental assistance that Defendant submitted to the MHDC, Defendant provided a Navy Federal bank account *****5276 (under Defendant's control) to receive rental assistance from the MHDC. After Defendant electronically submitted the fraudulent applications for rental assistance, those applications traveled by means of wire transmission through an out-of-state server before arriving at the MHDC for processing.

9. It was further part of the scheme and artifice to defraud that, based on the material misrepresentations that Defendant made in her fraudulent ERAP applications for rental assistance, the MHDC wired a total of \$31,200 to Defendant's bank account. Defendant spent the proceeds on personal expenses, including on car payments, retail shopping, and gambling.

C. Wire Transmission

10. On or about March 29, 2021, within the Eastern District of Missouri, for the purpose of executing the above-described scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same,

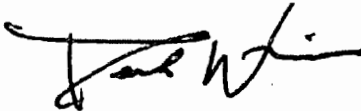
ANTIONETTE STEVENSON,

the defendant herein, did knowingly transmit and cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures, or sounds, to wit, an electronic ERAP application (#10645) for rental assistance that she submitted to the MHDC through an out-of-state server from the Eastern District of Missouri.

All in violation of Title 18, United States Code, Section 1343.

Dated: 8/27/2022

SAYLER A. FLEMING
United States Attorney



Derek J. Wiseman, #67257MO
Assistant United States Attorney

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

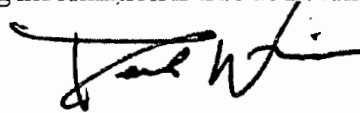
Plaintiff,

vs.

ANTIONETTE STEVENSON,

Defendant.

I, Derek J. Wiseman, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.



DEREK J. WISEMAN, #67257MO
Assistant United States Attorney

Subscribed and sworn to before me this 29th day of August 2022.



CLERK, U.S. DISTRICT COURT

By: /s/Jason W. Dockery
DEPUTY CLERK

FOR THE EASTERN
DISTRICT OF MISSOURI

